

# Inter-Agency Management Integration Team (IAMIT) Meeting Minutes June 16, 2016

Approval:  A.K. Smith  Ecology IAMIT Representative	Date: 7 / 28 / 16
Approval:  R.J. Corey  DOE-RLIAMIT Representative	Date: 7/18/16
Approval:  T.W. Fletcher  DOE-ORP IAMIT Representative	Date: 7-20-16
Approval:  D.A. Faulk  EPA IAMIT Representative	Date: 7/18/16
Approval:  R.E. Piippo  Mission Support Allignee, U.C.	Date: 7-11-16

## TPA Inter-Agency Management Integration Team Meeting

June 16, 2016



NAME (Please print)

#### **SIGNATURE**

ORGANIZATION: (Please print)

		A No. of the Section
Ray Corey	Michaeller Clin	DOE-RL
Suzanne Dahl		Ecology
Rana Evans		DOE-ORP
Dennis Faulk	10men	EPA
Tom Fletcher		DOE-ORP
Chris Kemp		DOE-ORP
Dan McDonald		Ecology
John Price		Ecology
Stephanie Schleif		Ecology
Alex Smith	aux Stel	Ecology
Bryan Trimberger		DOE-ORP
Ben Vannah	Ben W. Van	DOE-RL
Cheryl Whalen		Ecology
Sharon Braswell	Shann Braonyell	North Wind/MSA TPA
Jane V. Borghese	TUBERCLE	CHPRC
James T. Hamilton		WRPS
Carolyn Noonan	Convonan	MSA TPA
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Michael Turner	UU	MSA TPA

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U.S. Department of Energy Westerglen State Department of Ecology U.S. Environmental Protection Agency

<u>NAME</u> (Please print)	<u>SIGNATURE</u>	ORGANIZATION: (Please print)
Jeff Lesch	Nen 2	WCH
Kate Amrhein	Kate Col	OCE-RL
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Kathy Knox	Court reporter	
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# Inter-Agency Management Integration Team Meeting Minutes June 16, 2016

The Inter-Agency Management Integration Team (IAMIT) action tracking table was discussed as follows (see handout):

Action No. 1 – U.S. Department of Energy (DOE) - Richland Operations Office (RL) noted that the 200-IS-1 work plan was discussed during the Tri-Party Agreement (TPA) Quarterly Milestone Review meeting, and Washington State Department of Ecology (Ecology) had indicated its attorneys will provide a response by the end of next week (6/24/16). This action remains open.

Action No. 2 – DOE-RL stated that this action is related to the 200-IS-1 work plan, and action No. 2 will be addressed when action No. 1 is resolved. This action remains open.

Action No. 3 – DOE-RL stated that action Nos. 3 through 7 are DOE - Office of River Protection (ORP) actions. DOE-ORP was not present to address these actions. This action remains open.

Action No. 4 – See action No. 3. This action remains open.

Action No. 5 – See action No. 3. This action remains open.

Action No. 6 – See action No. 3. This action remains open.

Action No. 7 – See action No. 3. This action remains open.

Action No. 8 – DOE-RL stated that this action is associated with the TPA Appendix C updates for the 100 Area waste sites and the addition of new 100 Area sites. DOE-RL stated that U.S. Environmental Protection Agency (EPA) has reviewed the updates and has expressed tentative agreement. DOE-RL stated that Ecology had requested another copy, and a redline copy highlighting the changes was provided this week. This action remains open.

Action No. 9 – DOE-RL stated that Ecology is reviewing the TPA Appendix B update, and the parties have agreed this is a lower priority while higher priority issues are addressed. This action remains open.

Action No. 10 – DOE-RL inquired about the holdup with proceeding on implementing the all-electronic Administrative Record (AR). DOE-RL noted that a Kaisen for AR upgrades was done, and some of the initiatives are being implemented, but they are not related to the proposed all-electronic AR change. Ecology noted that the status for Action No. 10 states that a TPA change control

form was provided to DOE-RL, and asked if the change control form refers to the Kaisen. DOE-RL responded that the change control form does refer to the Kaisen initiatives, which are independent from the all-electronic AR initiative. DOE-RL stated that the TPA compliance order for the AR is directed to getting the AR in compliance if it is out of compliance. DOE-RL stated it was not appropriate to establish a TPA milestone to implement Kaisen upgrade initiatives. DOE-RL added that the Kaisen was about upgrading the AR and was not associated with a compliance issue. EPA indicated that the all-electronic AR initiative and the Kaisen initiatives could be considered independent, but a TPA change control form provides a pathway to dialogue about improving the AR. DOE-RL responded that there were discussions to improve the AR via the Kaisen, and steps are being taken.

EPA suggested scheduling a meeting and DOE-RL could brief Ecology about what has been implemented from the Kaisen initiatives and what could be deferred, especially in light of the expense. DOE-RL agreed with EPA's suggestion, but reiterated that the AR initiative and the Kaisen initiatives should be kept separate. DOE-RL added that it wants the AR database to be updated, and efforts are under way to identify funding. Ecology stated that an internal meeting would be held and then they will follow up with DOE-RL. This action remains open.

Action No. 11 – DOE-RL reported that the change request was signed May 25, 2016, and the new milestone extensions for the Central Plateau/300 Area have been finalized. DOE-RL noted that the Hanford Advisory Board (HAB) expressed appreciation to EPA, Ecology and DOE-RL for all the work that was done and for accommodating the public comments. DOE-RL provided a heads up that they are evaluating which documents will be affected by the new milestones, and a list will be provided to EPA and Ecology for review and input in the July 2016 time frame. DOE-RL stated that when agreement is reached with the TPA agencies, DOE-RL will follow up with change notices to update those documents. This action was closed.

<u>Action No. 12</u> – DOE-RL noted that this action was closed via discussion at the last IAMIT meeting. This action is closed.

<u>Action No. 13</u> – DOE-RL indicated that a project manager for the 325 Building is being worked and DOE-RL will provide an update or a name by the next IAMIT meeting. This action remains open.

Action No. 14 – DOE-RL stated that the public notice for the reactor surveillance and maintenance has been prepared and issued. This action was closed.

#### IAMIT ACTION TRACKING

June 16, 2016

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
1	DOE provided change control forms to Ecology on 09/16/14.	Ecology provide comments on TPA Appendix Change Control forms C-13-01 and C-14-02 that align the waste sites for operable unit 200-IS-1.	Open	Statused at monthly IAMIT, impacts TPA M/S M-015-112 IS-1 work plan that is in dispute. Revised C-13-01 is under review by Ecology.	ECY	
2	11/15/2013 transmits TPA chg ctrl form 12/03/2013 Ecology disapproves 12/10/2013. DOE initiates dispute.	Resolve dispute on Ecology disapproval of TPA change control form M-15-13-02. Milestone M-015-112, 200-IS-1 RFI work plan.	Open	Dispute extended at the project managers level to 03/30/2015 per extension agreement 01/29/15. Dispute extended at the project manager level to 09/30/15 in accordance with agreement signed on 05/14/15. (1501370) On 09/09/15, the parties agreed to extend the dispute at the project manager level to 12/31/15. On 11/19/15, the parties agreed to extend the dispute to 01/28/15. On 01/11/16, the parties agreed to extend the dispute at the project manager level until 02/29/16. On 01/11/16, the parties agreed to extend the dispute at the project manager level until 02/29/16. On 01/11/16, the parties agreed to extend the dispute at the project manager level until 02/29/16. On 02/16/16, the parties agreed to extend the dispute at the project manager level until 03/31/16. On 03/17/16, the parties agreed to extend the dispute at the project manager level until 05/31/16. On 05/19/16, the parties agreed to extend the dispute at the project manager level until 05/31/16. On 05/19/16, the parties agreed to extend the dispute at the project manager level until 08/01/16.	Project managers resolve dispute.	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
3	Ecology disapproved TPA change control form M-62-14-02.	Resolve dispute on Ecology disapproval of TPA change control form M-62-14-02.  Milestone M-062-45, Comp. Neg's 6-Mo After Last Issuance of System Plan.	Open	On 05/11/15, the parties agreed to extend dispute resolution at the project manager level until 06/15/15. On 06/11/15 the parties agreed to extend dispute resolution at the project manager level until 10/22/15. On 09/21/15, the parties agreed to extend the dispute at the project manager level until 02/18/16. On 02/18/16, the parties agreed to extend the dispute at the project manager level until 03/31/16. On 03/30/16, the parties agreed to extend the dispute at the project manager level until 03/31/16. On 03/30/16, the parties agreed to extend the dispute at the project manager level until 05/20/16. On 05/19/16, the ORP and Ecology agreed to extend the dispute at the project manager level until 06/30/16.	Project managers resolve dispute.	

Resolve dispute on Ecology disapproval of TPA change control form M-45-15-01 Milestone M-045-92 identifies due date for construction of SX Barriers 1 and 2 and design and construction of Barriers 3 and 4.  Resolve dispute on Ecology disapproval of TPA change control form M-45-15-01 to ECY on 03/31/15 via letter 15-TF-0027, to modify M-045-92 due dates for barrier 1 and 2 construction, and barrier 3 and 4 design and construction of Earlier I and 2 construction, and barrier 3 and 4 design and construction in letter 15-TF-0042. On 04/20/15, ORP initiated dispute resolution in letter 15-TF-0042. On 04/23/15, ORP and ECY agreed to extend the period for dispute resolution at the project manager level until 10/15/15. On 10/15/15, the parties agreed to extend the dispute at the project manager level until 10/15/15. On 10/15/15, the parties agreed to extend the dispute at the project manager level until 10/15/15.	#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
	4	TPA change control	TPA change control form M-45-15-01. Milestone M-045-92 identifies due date for construction of SX Barriers 1 and 2 and	Open	form M-45-15-01 to ECY on 03/31/15 via letter 15-TF-0027, to modify M-045-92 due dates for barrier 1 and 2 construction, and barrier 3 and 4 design and construction. ECY disapproved the change control form on 04/14/15, and followed with disapproval letter 15-NWP-075 dated 04/17/15. On 04/20/15, ORP initiated dispute resolution in letter 15-TF-0042. On 04/23/15, ORP and ECY agreed to extend the period for dispute resolution at the project manager level until 08/16/15. On 07/30/15, the parties agreed to extend the dispute at the project manager level until 10/15/15. On 10/15/15, the parties agreed to extend the dispute at the project		

		On 11/13/15, the parties agreed to		
		extend the dispute at the project		
		manager level until 11/20/15. On		
		11/19/15, the parties agreed to		
		extend the dispute at the project		
		manager level through 12/02/15.		
		On 12/02/15, the parties agreed to		
		extend the dispute at the project		
		manager level until 01/29/15. On		
		01/21/16, the parties agreed to		
		extend the dispute at the project		
		manager level until 02/16/16. The		
		dispute was elevated to the	1	
		IAMIT-level on 02/18/16. On		
		03/10/16 ECY signed an IAMIT		
		determination that allows a path		
		forward on this package pending		
		resolution of the Consent Decree,	-	
		and should either party withdraw		
		their consent in accordance with		
		this agreement, then the matter		
		shall be placed on the agenda of		
		the next regularly scheduled		
		IAMIT meeting following the		
		receipt of written notice of		
		withdrawal by the other		
× .		party. The IAMIT shall then have		
		twenty-one (21) days to		
		unanimously resolve the dispute		
		in accordance with HAFFACO		
		the state of the s		
		Article VIII, Resolution of		
		Disputes, Paragraph 30, Section		
		D. Using IAMIT Determination		
		2016-2, the IAMIT has agreed	1	
		that the dispute on change control		
	•	form M-45-15-01 is extended at		
		the IAMIT level until 05/20/16.		
		On 05/19/16 using IAMIT		
		Determination 2016-003, the		
		IAMIT has agreed that the dispute		
		on change control form M-45-16-		
		01 is extended at the IAMIT level		
		until 06/03/16.		
		opposition to the second of th		

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
5	Ecology disapproved TPA change control form M-45-15-03	Resolve dispute on Ecology disapproval of TPA change control from M-45-15-03. Milestone M-045-82, "Submit complete permit modification request for Tiers 1, 2, and 3 of the SST System to support final closure requirements for WMA-C."	Open	On 07/16/15, DOE initiated dispute. On 08/10/15, the parties agreed to extend the dispute resolution period until 10/20/15. On 10/19/15, the parties agreed to extend the dispute at the project manager level until 02/18/16. On 02/16/16, the parties agreed to extend the dispute at the project manager level until 03/25/16. On 03/24/16, the parties agreed to extend the dispute at the project manager level until 03/25/16. Substantive discussions are ongoing. On 05/19/16 ORP and Ecology agreed to extend the dispute at the project manager level until 08/01/16.	Project managers resolve dispute	
6	Ecology Disapproved TPA change control form M-47-15-01 on 01/12/16	Resolve dispute on Ecology disapproval of TPA change control form M-47-15-01.  Milestone M-047-07, "Submit CD-1 for the Secondary. Liquid Waste Treatment Project".	Open	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. On 02/18/16, the parties agreed to extend the dispute at the project manager level until 03/31/16. On 03/30/16, the parties agreed to extend the dispute at the project manager level until 05/20/16. On 05/19/16 ORP and Ecology agreed to extend the dispute at the project manager level until 05/20/16.	Project managers resolve dispute	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
7	Ecology Disapproved TPA change control form M-90-15-01 on 01/12/16	Resolve dispute on Ecology disapproval of TPA change control form M-90-15-01. Milestone M-090-13, "Submit a CD-1 for the Interim Hanford Storage Project".	Open	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. On 02/18/16, the parties agreed to extend the dispute at the project manager level until 03/31/16. On 03/30/16, the parties agreed to extend the dispute at the project manager level until 05/20/16. On 05/19/16, ORP and Ecology agreed to extend the dispute at the project manager level until 05/30/16.	Project managers resolve dispute	
8	12/04/2014 DOE transmits draft TPA App C 12-12-03 change ctrl form to update 100 Area waste sites	EPA and Ecology review and provide comments to DOE	Open	Ecology EPA comments complete, and reclassification form for 100 K reactors tentatively accepted. Appendix J draft chg ctrl form provided to the regulators. 100-N-66 WIDS description under revision by Ecology and WCH.  In February, Alicia Boyd and WCH reached agreement on 100-N-66 revised description. Updated TPA Appendix C and J were distributed to regulators for EPA and Ecology in March. EPA agreement on changes received. On 05/19/16 Ecology stated they would follow up with DOE-RL on 05/20/16 regarding Appendix C.	ECY	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
9	TPA Appendix B update	Provide draft TPA simple changes Appendix B change control form to regulators.	Open	DOE provided Ecology with revisions to draft Appendix B change control form (B-15-01) in September. Ecology is reviewing. On 05/19/16 Ecology stated this will be reviewed once progress is made on higher priority updates and reviews.	ECY	
10	Change control form P-09-15-01 provided to regulators	P-09-15-01, "Modifications to Hanford Federal Facility Agreement and Consent Order (HFFACO) Section 9.4, Administrative Record (AR) to eliminate hard copy requirement".	Open	Public announcement reviewed and approved by parties. Ecology has expressed interest in linking this initiative with the AR upgrade effort. On 05/19/16 Ecology reported that a draft TPA change form has been prepared and they will share with DOE-RL. On 05/25/16, Ecology provided DOE-RL with a draft TPA change control form that, if approved, would create milestones for an upgrade to the TPA Administrative Record.	ECY/EPA/DOE	
11	M-15,16,37,85,94 Series' Tentative Agreement/response to comment	TPA agencies complete response summary and approve change control forms.	Open	Public comment binning processes completed. Public comments now in Hanford AR. Next steps, come to agreement on milestone revisions, and complete responsiveness summary. Approve and implement change control forms. On 05/25/16 the change control forms were approved and signed by the TPA agencies. Letters announcing these changes to the public are in the final stages of being signed and issued.	ECY/EPA/DOE	

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12	DOE transmits TPA chg ctrl form 12/14/2015 and EPA disapproves. DOE initiates dispute on 12/21/2015.	Resolve dispute on EPA disapproval of TPA change control form M-16-15-08, Remove the 600-349 waste site from Tri-Party Agreement Interim Milestone M-016-149.	Closed	Dispute elevated to IAMIT on 01/13/2016 with EPA allowance to submit SOD on 01/21/2016. On 01/28/16, the parties agreed to extend the dispute at the IAMIT level until 03/18/16. On 03/17/16, the parties agreed to extend the dispute at the IAMIT level until 05/31/16. On 4/14/2016, received EPA approval (email) to begin the process of closing out the 600-349 site. On 05/19/16 DOE-RL stated it had discussions with EPA and work has been finished now going through EPA reviews. On 05/26/16, per agreement with EPA, RL issued a letter documenting completion of the milestone and withdrawal of this dispute.	DOE/EPA	05/26/2016
13	On 05/10/2015 Ecology requested discussion at May 19, 2016 IAMIT meeting	Clarifying DOE-RL TPA Project Manager role for the 325 Building TSD	Open	Clarification/assignment needed. On 05/19/16 DOE-RL stated efforts are under way to identify project manager.	ECY/DOE	
14	On 05/10/2015 Ecology requested discussion at 05/19/16 IAMIT meeting	Public notice on Class 3 TPA changes for Reactor Surveillance and Maintenance.	Open	Ecology requested public notice/comment on Class 3 changes for Reactor Surveillance and Maintenance. On 05/19/16 Ecology stated it had requested a public notice. EPA agreed and suggested a Listserv be sent.	ECY/DOE	i i